

23cv01300
Ali Alexander Moore
07/10/24

MEMO ENDORSED

City Defendants are directed to respond by Monday, July 22, 2024. SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: 7/17/2024

New York, New York

Motion to compel

Motions to Compel Regarding Sergeant Pierre

Motion to Compel Disclosure of Familial Relationship:

Title: Motion to Compel Disclosure of Familial Relationship Between Sergeant Pierre and Karine Jean-Pierre

Purpose: The Plaintiff respectfully requests the court to compel Sergeant Pierre to disclose whether he is related to Karine Jean-Pierre, a member of the Biden administration.

Motion to Compel Attendance Verification:

Title: Motion to Compel Disclosure of Sergeant Pierre's Attendance at Social Event

Purpose: The Plaintiff respectfully requests the court to compel Sergeant Pierre to confirm whether he attended the same birthday party as the Plaintiff on June 13, 2021.

Motion to Compel Geographical Presence:

Title: Motion to Compel Disclosure of Sergeant Pierre's Geographical Presence

Purpose: The Plaintiff respectfully requests the court to compel Sergeant Pierre to disclose if he was in Los Angeles, California, on August 27, 2021.

Motion to Compel Visual Identification:

Title: Motion to Compel Disclosure of Visual Identification of Sergeant Pierre

Purpose: The Plaintiff respectfully requests the court to compel the Civilian Complaint Review Board to provide a photograph of Sergeant Pierre, as it was not uploaded during the initial review process.

These motions aim to obtain specific information related to Sergeant Pierre's potential familial ties, presence at certain events, and visual identification, which are pertinent to the ongoing investigation and case.

Motions to Compel Regarding Sergeant Pierre

Motion to Compel Disclosure of Relationship:

Title: Motion to Compel Disclosure of Relationship Between Sergeant Pierre and Karen Eubanks

Purpose: The Plaintiff respectfully requests the court to compel Sergeant Pierre to disclose whether he has any relationship or acquaintance with Karen Eubanks.

Motion to Compel Knowledge of Neighbor:

Title: Motion to Compel Disclosure of Knowledge of Plaintiff's Haitian Neighbor

Purpose: The Plaintiff respectfully requests the court to compel Sergeant Pierre to disclose if he is acquainted with the Plaintiff's Haitian neighbor who is employed as a nurse.

Motion to Compel Disclosure of Acquaintance with Other Neighbors:

Title: Motion to Compel Disclosure of Sergeant Pierre's Acquaintance with Plaintiff's Neighbors or Their Children

Purpose: The Plaintiff respectfully requests the court to compel Sergeant Pierre to disclose whether he knows any of the Plaintiff's other neighbors or their children.

These motions seek to ascertain the nature and extent of Sergeant Pierre's relationships and acquaintances, which are relevant to the ongoing investigation and case.

Motions to Compel Regarding Sergeant Pierre

Motion to Compel Disclosure of Relationship:

Title: Motion to Compel Disclosure of Relationship Between Sergeant Pierre and Karen Eubanks' Associate, Pepper

Purpose: The Plaintiff respectfully requests the court to compel Sergeant Pierre to disclose whether he is acquainted with an individual named Pepper, who is a known associate of Karen Eubanks.

Motion to Compel Knowledge of the Herberts:

Title: Motion to Compel Disclosure of Sergeant Pierre's Knowledge of the Herberts

Purpose: The Plaintiff respectfully requests the court to compel Sergeant Pierre to disclose if he is familiar with or has any relationship with individuals known as the Herberts.

Motion to Compel Disclosure of Acquaintance with the Zirinsky Family:

Title: Motion to Compel Disclosure of Relationship Between Sergeant Pierre and the Zirinsky Family

Purpose: The Plaintiff respectfully requests the court to compel Sergeant Pierre to disclose whether he knows or has any associations with the Zirinsky family.

These motions are designed to elicit detailed information regarding Sergeant Pierre's connections and relationships, which are pertinent to the ongoing case.